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December 2, 2021

VIA ECF

Hon. Leda Dunn Wettre, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Bldg.
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: Deborah Gross-Quatrone v. Bonnie Mizdol, et al.,
Civil Action No. 17-cv-13111 (JXN) (LDW)**

Dear Judge Wettre:

Along with Ralph Ferrara and Kevin Kotch of The Ferrara Law Group, I am co-counsel for plaintiff the Hon. Deborah Gross-Quatrone in this action. I am writing seeking clarification of your Letter Order dated November 16, 2021 [ECF No. 162].

Previously, Your Honor's Amended Scheduling Order dated November 5, 2021 [ECF No. 159] set a deadline of December 13, 2021, for submission of affirmative expert reports. On November 15, 2021, defendants requested permission to file a motion to compel an independent medical exam (IME), pursuant to Fed. R. Civ. P. 35 [ECF No. 160]. Your Honor's November 16th Letter Order granted defendants permission to file the motion, and stated:

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The Court will revisit the deadline for service of affirmative expert reports following the disposition of the motion to compel plaintiff's examination.

Defendants filed their motion to compel the IME, making it returnable on December 20, 2021, a week after the original deadline for affirmative expert reports [ECF No. 163].

I simply want to verify that the upshot of Your Honor's ruling is that the December 13th deadline for affirmative expert reports is no longer in effect, and that the Court will establish a new schedule for expert discovery after the motion to compel the IME is resolved. Otherwise, I think it would be unfair if plaintiff were held to the original schedule but defendants were not.

I would appreciate it if Your Honor would clarify that the foregoing understanding is correct.

Thank you for Your Honor's courtesies.

Respectfully submitted,

THE DWYER LAW FIRM, L.L.C.

/s/ Andrew Dwyer

Andrew Dwyer

Cc: Kathleen Dohn (via ECF)
William Tambussi (via ECF)
Kayla Louis (via ECF)
Ralph Ferrara (via ECF)
Kevin Kotch (via ECF)